

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

**BorgWarner Transmission Systems LLC  
700 South 25<sup>th</sup> Avenue  
Bellwood, Illinois 60104**

**ATTENTION:**

**Joe McCulloch, Plant Manager**

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring BorgWarner Transmission Systems, LLC (BorgWarner or you) to submit certain information about the facility at 700 South 25<sup>th</sup> Avenue, Bellwood, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within thirty (30) calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

BorgWarner owns and operates an emission at the Bellwood, Illinois facility. We are requesting this information to determine whether your emission source is complying with Illinois State Implementation Plan, National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating at 40 C.F.R. Part 63, Subpart JJJJ, and National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products at 40 C.F.R. Part 63, Subpart MMMM requirements.

BorgWarner must send all required information to:

Attn: Compliance Tracker, AE-18J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

BorgWarner must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false *statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.*

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”


This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject BorgWarner to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Manoj P. Patel at (312) 353-3565 or by e-mail at [patel.manjkumar@epa.gov](mailto:patel.manjkumar@epa.gov).

12/22/17  
Date

  
\_\_\_\_\_  
Edward Nam  
Director  
Air and Radiation Division

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating at 40 C.F.R. Part 63, Subpart JJJJ or National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products at 40 C.F.R. Part 63, Subpart MMMM.

## **Appendix B**

### **Information You Are Required to Submit to EPA**

Within thirty (30) calendar days of receipt of this request, BorgWarner Transmission Systems, LLC (BorgWarner) must submit the following information requested for its facility located at 700 South 25<sup>th</sup> Avenue, Bellwood, Illinois (facility), pursuant to Section 114 of the Clean Air Act (the CAA), 42 U.S.C. § 7414. Provide the following information from the January 1, 2013 to the date you receive this request for the facility.

1. Provide a schematic diagram of the facility, including a corresponding list depicting the location of various process equipment.
2. Provide a detailed description of each piece of process equipment and its air pollution control device(s) used for frictional plates manufacturing, its installation date, and a detailed description, including the date, of any modification(s) to the process equipment.
3. Provide copies of all documents related to any maintenance and repairs conducted on air pollution control equipment.
4. Provide copies of all air permits issued by the Illinois Environmental Protection Agency (IEPA) including, but not limited to, Clean Air Act Permit Program (CAAPP) Permits, Construction Permits, or Permits to Install.
5. For each emission unit, provide the actual hours of operation in hours per day, days per week, and hours per year.
6. Provide any Startup, Shutdown, and Malfunction (SSM) plans for the source, control system(s), and monitoring system under 40 C.F.R. § 63.6(e)(3)(v). Provide the following information related to the SSM plan:
  - a. Records showing consistency of actions with SSM plan (40 C.F.R. §§ 63.6(e)(3)(iii), 63.10(b)(2));
  - b. Records showing any actions inconsistent with SSM Plan (40 C.F.R. § 63.6(e)(3)(iv));
  - c. Written Compliance Monitoring System (CMS) quality control program (40 C.F.R. § 63.8(d)); and
  - d. A record of data from CMS measurements, audits, calibrations, and malfunctions (40 C.F.R. §§ 63.10(b)(2), 63.10(c)).
7. Provide a list of all emission testing conducted at the facility for any reason from January 1, 2013 to the present, and provide copies of all associated emission test reports. Emission testing includes, but is not limited to: compliance testing; engineering testing; experimental testing; and testing for general information, including all test runs or a

partial run(s). Use the following guidelines for compiling the list and preparing copies of the test reports:

- a. **List:** Identify the emission unit; control device; date of the test; federal or state regulation that requires the test (if applicable); test method(s) used; physical location of the sample collection points (e.g., before or after emission unit or air pollution control device); and the production rate of the associated emission unit. For each test during which the emission unit was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with IEPA.
  - b. **Copies:** Provide full test reports, including the summary pages; section(s) describing the process parameters and production or processing rates at the time of the test; all test runs; and all calculations.
8. For Glue Line 1 (GL1), Glue Line 2 (GL2), Glue Line 3 (GL3), and Roll Coat Glue Line (RCGL), as required by Section 4.1.2.e. ii. (Recordkeeping) requirements under CAAPP Permit No. 96030033, and Recordkeeping Requirements at 40 C.F.R. Part 63 § 63.3930 (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products at 40 C.F.R. Part 63, Subpart M MMMM (Subpart M MMMM), provide the following records:
- a. A copy of each notification and report that the facility submitted to comply with Subpart M MMMM, and the documentation supporting each notification and report;
  - b. Records of all coating used including
    - i. Hazardous Air Pollutants (HAP) content (weight percent) of each material used; and
    - ii. Individual HAP emissions and combinations of HAPs emissions (tons/month and tons/year).
  - c. A current copy of information provided by material suppliers or manufacturers, such as manufacturer's formulation data, or test data, including summary sheets, used to determine the mass fraction of organic HAP and density for each coating, thinner, other additive, cleaning material, and the volume fraction of coating solids for each coating;
  - d. If you conducted testing to determine mass fraction of organic HAP, density or volume fraction of coating solids, provide copy of the complete test report(s);
  - e. Records of the calculation of the organic HAP content for each coating, using Equation 2 of 40 C.F.R. § 63.3941;
  - f. A record of the name and volume (or purchase records, if applicable) of each coating, thinner, other additive, and cleaning material used;

- g. A record of the mass fraction of organic HAP for each coating, thinner, other additive, and cleaning material used;
  - h. A record of the volume fraction of coating solids for each coating used;
  - i. If you used the emission rate without add-on controls compliance option, provide records showing the density for each coating, thinner, other additive, and cleaning material used; and
  - j. If you used the emission rate without add-on controls compliance option and the calculation includes an allowance for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF), provide records of:
    - i. The name and address of each TSDF;
    - ii. The date of each shipment;
    - iii. Identification of coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these waste materials when calculating the emission rate;
    - iv. The methodology used to determine total amount of waste materials sent to or the amount collected, stored and designated for transport to a TSDF each month and the methodology used to determine the mass of organic HAP contained in these waste materials; and
    - v. Records of the date, time and duration of each deviation.
9. For Emission Units - ROSS I (Saturating, Pre-Curing and Curing Line), ROSS II (Saturating, Pre-Curing, and Curing Line), and ATL Line, as required by Section 4.3.2.e. ii.(I) (Recordkeeping) of the CAAPP Permit No. 96030033, provide the following records:
- a. Testing of volatile organic matter (VOM) content of coatings and clean up solvents to include:
    - i. Identification of material tested;
    - ii. Results of analysis;
    - iii. Documentation of analysis methodology; and
    - iv. Person performing analysis.



- b. Testing of the efficiency of each capture system and air pollution control to include:
    - i. The date, place, and time of sampling or measurements;
    - ii. The date(s) analyses were performed;
    - iii. The company or entity that performed the analyses;
    - iv. The analytical techniques or methods used;
    - v. The results of such analyses; and
    - vi. The operating conditions as existing at the time of sampling or measurements.
  - c. Daily records of the following information:
    - i. Air pollution control device monitoring data;
    - ii. A log of operating time for the capture system, air pollution control device, monitoring equipment and associated emission source; and
    - iii. A maintenance log for the capture system, air pollution control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
  - d. Records of the coating usage for each coating lines, gallons/month and gallons/year;
  - e. The VOM content of coatings, % by weight;
  - f. Density of coatings, lb/gallon;
  - g. The solvent usage for the affected coating lines, gallons/month and gallons/year;
  - h. Density of solvent, lb/gallon; and
  - i. The monthly and aggregate annual VOM emissions from the coating lines based on the coating and solvent usage and the afterburner efficiency, with supporting calculations.
10. For Emission Units - ROSS I (Saturating, Pre-Curing and Curing Line), ROSS II (Saturating, Pre-Curing, and Curing Line), and ATL Line, as required by Section 4.3.2.e. ii.(I) (Recordkeeping) of the CAAPP Permit No. 96030033, and Recordkeeping Requirements at 40 C.F.R. § 63.3410 (National Emission Standards for Hazardous Air

Pollutants for Paper and Other Web Coating at 40 C.F.R. Part 63, Subpart JJJJ), provide the following records on monthly basis:

- a. Continuous emissions monitor data in accordance with the requirements of 40 C.F.R. § 63.3350(d);
  - b. Records specified in 40 C.F.R. § 63.10(c) for each CMS operated by the facility in accordance with the requirements of 40 C.F.R. § 63.3350(b);
  - c. Control device and capture system operating parameter data in accordance with the requirements of 40 C.F.R. § 63.3350(c), (e), and (f);
  - d. Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of 40 C.F.R. § 63.3360(c);
  - e. Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of 40 C.F.R. § 63.3360(d);
  - f. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of 40 C.F.R. § 63.3360(e) and (f);
  - g. Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstration using these data in accordance with the requirements of 40 C.F.R. § 63.3370(b), (c), and (d);
11. Provide the following information for each Thermal Oxidizer (TO) system at the facility:
- a. Documentation demonstrating if the TO is a regenerative or recuperative TO;
  - b. Rated firing capacity of each fuel burner (mmBtu/hour);
  - c. Records from the monitoring system used to monitor the valve or damper position for the flow of each control device used to direct various exhaust streams to the TO;
  - d. Monthly natural gas usage records (in cubic feet per month);
  - e. Hourly temperature readings, in an Excel Workbook, including date and time of the readings;
  - f. Describe any maintenance issues the facility has corrected since the construction and operation of the unit; and
  - g. Any permit deviation reports, including start up, shut down, and malfunction events.

## **Appendix C**

### **Confidential Business and Personal Privacy Information**

#### **Assertion Requirements**

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

## **Determining Whether the Information Is Entitled to Confidential Treatment**

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

### **Personal Privacy Information**

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

**CERTIFICATE OF MAILING**

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

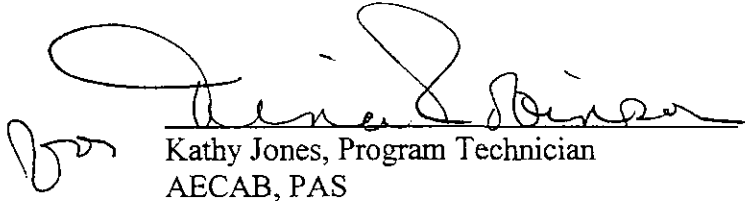
Joe McCulloch, Plant Manager  
BorgWarner Transmission Systems, LLC  
700 South 25<sup>th</sup> Avenue  
Bellwood, Illinois 60104

I also certify that I sent a copy of the Request to Provide Information Pursuant to the

Clean Air Act by E-mail to:

Julie Armitage  
Chief, Bureau of Air, Illinois Environmental  
Protection Agency  
Julie.Armitage@Illinois.gov

On the 29<sup>th</sup> day of December 2017.

  
Kathy Jones, Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009168000026606844